

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.B.,)	CIVIL ACTION FILE
)	
Plaintiff,)	NO. 1:22-cv-01181-JPB
)	
v.)	
)	
RED ROOF INNS, INC., <i>et al.</i> ,)	
)	
Defendants.)	

**RRI DEFENDANTS' MOTION TO SEAL AND FOR LEAVE TO FILE
UNDER SEAL**

Pursuant to Fed R. Civ. P. 26(c), Fed. R. Civ. P. 5.2(d), and Local Rule 79.1(b) Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC (RRI Defendants) respectfully request to file Exhibit A to the Declaration of Tamara Ross under seal. This document contains personal and confidential information that would subject parties to substantial injury if made publicly available and further violate the protective order put forth in this case. For the foregoing reasons, the Court should therefore grant this Motion.

A Memorandum in Support of this Motion is contemporaneously filed and incorporated fully.

Dated: October 31, 2024

Respectfully submitted,

/s/ Sandra J. Wunderlich

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RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 31, 2024

/s/ Sandra J. Wunderlich

Sandra J. Wunderlich

*Attorneys for Defendants Red Roof Inns,
Inc., FMW RRI I, LLC, and RRI West
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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2024, a copy of the forgoing was filed electronically. Service of this filing will be made pursuant to Civ. R. 5(b)(2)(e) through this Court's electronic filing system. Parties may access the filing through the Court's system.

Dated: October 31, 2024

/s/ Sandra J. Wunderlich

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